

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROSLYN BROWN, and R.Z., a Minor, through)
her Mother and Next Friend, Roslyn Brown,)
Plaintiffs,)
v.) Case No. 4:17-cv-1542
CITY OF PINE LAWN, MISSOURI,)
FORMER PINE LAWN LIEUTENANT)
STEVEN BLAKENEY,)
PINE LAWN POLICE OFFICER)
LAWRENCE FLEMING,)
PINE LAWN POLICE OFFICER)
BRIAN BRITTON,)
PINE LAWN POLICE OFFICER)
FELICIA SHELTON,)
PINE LAWN POLICE OFFICER)
STEVEN LOWMAN, and)
PINE LAWN HOUSING INSPECTOR)
RAYMOND WINSTON,)
Defendants.)

AMENDED JOINT PROPOSED SCHEDULING PLAN

Pursuant to this Court's order of January 8, 2019, (ECF No. 100), the parties, by and through counsel, jointly propose to the Court the following scheduling plan:

- a. This case has been assigned to Track 2 (Standard), which the parties believe is appropriate.
- b. Motions for joinder of additional parties or amendment of the pleadings shall be filed no later than **March 1, 2019**.
- c. Discovery shall be conducted as follows:
 - i. The parties shall exchange the initial disclosures required by Fed.R.Civ.P. 26(a)(1) by **July 27, 2018**.

- ii. The parties agree that discovery need not be conducted in phases or limited to certain issues.
- iii. The presumptive limits of ten (10) depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A), and twenty five (25) interrogatories per party as set forth in Fed.R.Civ.P. 33(a) shall apply in this case.
- iv. Mental or physical examinations pursuant to Fed.R.Civ.P. 35 may be requested in this case.
- v. Plaintiffs shall disclose their expert witnesses' identities and reports by **March 1, 2019**, and make expert witnesses available for deposition by **March 29, 2019**. Defendants shall disclose their expert witness identities and reports by **May 17, 2019**, and make their expert witnesses available for depositions by **June 21, 2019**.
- vi. All discovery shall be completed by **June 28, 2019**. Motion(s) to Compel shall be filed by **July 12, 2019**.
- vii. Any other matters pertinent to the completion of discovery in this case? **None at this time.**

- c. The parties agree to participate in mediation and such mediation would be most productive after **March 1, 2019**, but before **April 19, 2019**.
- d. All dispositive motions shall be filed by **July 26, 2019**.
- e. The earliest date by which this case should reasonably be expected to be ready for trial is **December 2, 2019**.
- f. The parties estimate the length of time expected to try the case to verdict to be seven (7) days.

WHEREFORE, the Parties pray this Court adopt this Joint Proposed Scheduling Plan, and for any other relief as this Court deems proper.

Dated: January 11, 2019

Respectfully submitted,

ARCHCITY DEFENDERS, INC.

By: /s/ John M. Waldron

Blake A. Strode (MBE #68422MO)

Michael-John Voss (MBE #61742MO)

Sima Atri (MBE #70489MO)

John M. Waldron (MBE #70401MO)

440 N. 4th Street, Suite 390

Saint Louis, MO 63102
855-724-2489 ext. 1021
314-925-1307 (fax)
bstrode@archcitydefenders.org
mjvoss@archcitydefenders.org
satri@archcitydefenders.org
jwaldron@archcitydefenders.org

Attorneys for Plaintiff

/s/ Matthew W. Murphy (with consent)

Matthew W. Murphy #47786MO
Sarah L. Crawford #70010MO
3901 S. Providence, Suite D
Columbia, MO 65203

Tel: (573) 777-4488
Fax: (573) 777-4489

Matt@vbmlaw.com
sarah@vbmlaw.com

Attorneys for Defendant Steven Blakeney

and

KING KREHBIEL & HELLMICH, LLC

/s/ Blake D. Hill (with consent)

Blake D. Hill #58926MO
2000 South Hanley Road
St. Louis, MO 63144-1524
Phone: 314-646-1110
Fax: 314-646-1122
E-mail: bhill@kingkrehbiel.com

*Attorney for Defendants City of Pine Lawn and
Defendants Fleming, Britton, Shelton, Winston,
and Lowman*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all parties of record will receive notice of the foregoing via this Court's electronic filing system on this 11th day of January, 2019.

/s/ John M. Waldron